



Signed and Filed: April 28, 2022

DENNIS MONTALI
U.S. Bankruptcy Judge

WEIL, GOTSHAL & MANGES LLP
Theodore Tsekerides (*pro hac vice*)
(theodore.tsekerides@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
767 Fifth Avenue
New York, NY 10153-0119
Tel: 212 310 8000
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP
Tobias S. Keller (#151445)
(tkeller@kbbkllp.com)
Jane Kim (#298192)
(jkim@kbbkllp.com)
David A. Taylor (#247433)
(dtaylor@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

*Attorneys for Debtors and Reorganized
Debtors*

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**ORDER APPROVING
STIPULATION ENLARGING
TIME FOR KAVEH GHAEMIAN,
MARY GHAEMIAN, AND
KASPIAN GHAEMIAN TO FILE
PROOF OF CLAIM**

1 The Court having considered the *Stipulation Enlarging Time for Kaveh Ghaemian, Mary*
2 *Ghaemian, and Kaspian Ghaemian to File Proof of Claim*, dated April 26, 2022 [Dkt. No. 12252]
3 (the “**Stipulation**”),¹ entered into by PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and
4 Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**”
5 or the “**Reorganized Debtors**”) in the above-captioned cases (the “**Chapter 11 Cases**”), on the
6 one hand, and Kaveh Ghaemian, Mary Ghaemian, and Kaspian Ghaemian (“**Movants**”), on the
7 other hand; and pursuant to such Stipulation and agreement of the Parties, and good cause
8 appearing,

9 IT IS HEREBY ORDERED THAT:

- 10 1. The Stipulation is approved.
- 11 2. The Proof of Claim is deemed timely filed.
- 12 3. The Proof of Claim and Asserted Fire Victim Claims shall for all purposes be treated
13 and classified as Fire Victim Claims under the Plan, and shall be fully assumed by, and the sole
14 responsibility of, the Fire Victim Trust and subject to the Channeling Injunction, to be
15 administered, processed, settled, disallowed, resolved, liquidated, satisfied, and/or paid in
16 accordance with the Fire Victim Trust Agreement and the Fire Victim Claims Resolution
17 Procedures. Movants shall have no further recourse against the Debtors or Reorganized Debtors,
18 as applicable, with respect to the Proof of Claim or the Asserted Fire Victim Claims.
- 19 4. Nothing herein shall be construed to be a waiver by the Debtors or the Reorganized
20 Debtors, as applicable, the Fire Victim Trust, or any other party in interest of any right to object to
21 the Asserted Fire Victim Claims or the Proof of Claim on any grounds other than the untimely
22 filing thereof.
- 23 5. Nothing herein shall be construed to be a waiver by Movants of their rights to
24 oppose any asserted challenge to the Asserted Fire Victim Claims or the Proof of Claim.
- 25
- 26

27 ¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to
28 them in the Stipulation.

1 6. By entry of this Order, the *Motion to Allow/Deem Timely Late Filing of Proof of*
2 *Claim by Kaveh Ghaemian, Mary Ghaemian, and Kaspian Ghaemian* [Dkt. No. 12119] is deemed
3 withdrawn with prejudice.

4 7. The Stipulation is binding on the Parties and each of their successors in interest.

5 8. The Stipulation constitutes the entire agreement and understanding of the Parties
6 relating to the subject matter thereof and supersedes all prior agreements and understandings relating
7 to the subject matter thereof.

8 9. This Court shall retain jurisdiction to resolve any disputes or controversies arising
9 from the Stipulation or this Order.

10 *** END OF ORDER ***

11
12 Dated: April 26, 2022

13 FRANTZ LAW GROUP, APLC

14
15 /s/ James P. Frantz
16 James P. Frantz, Esq.

17 *Attorneys for Kaveh Ghaemian, Mary*
18 *Ghaemian, and Kaspian Ghaemian*
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